



Reporting Requirements and Technical Assistance





Goals of Climate Leaders Reporting

- ◆ Provide Partners with assistance to create a high-quality inventory that will be maintained over time
- ◆ Limit Partners' reporting burden and provide flexibility
- ◆ Provide EPA the confidence needed to provide high-level recognition through a voluntary program



June Reporting Options

- ◆ Option 1: Detailed data
 - ✦ submit annual reporting form and facility level supporting data every year
- ◆ Option 2: Inventory management plan
 - ✦ submit annual reporting form every year
 - ✦ submit facility level supporting data in first and last year
 - ✦ contractor review of inventory management plan in first year
- ◆ Option 3: Third party verification
 - ✦ submit annual reporting form and audit report every year



Feedback from June Meeting

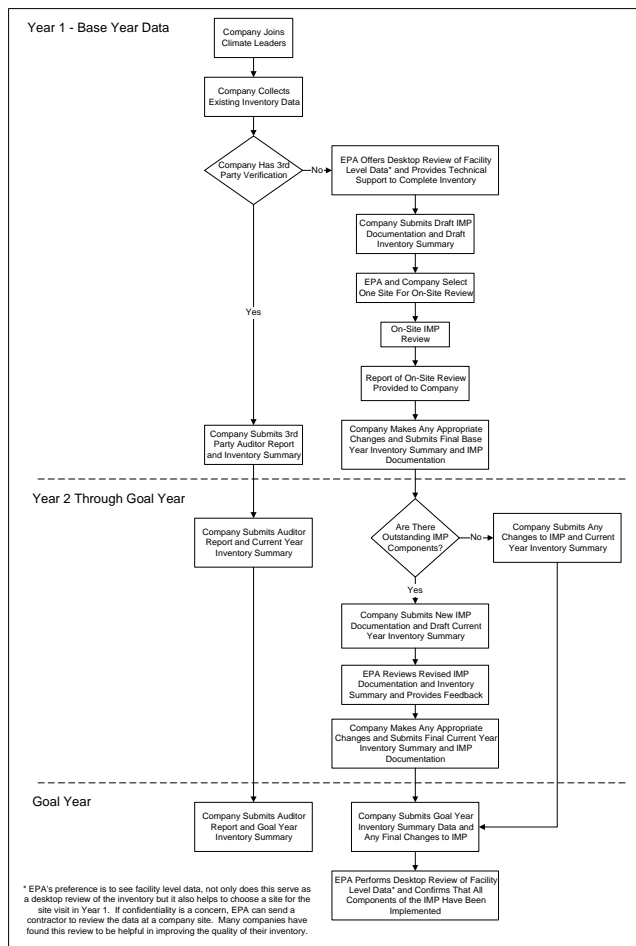
- ◆ There is concern that the three reporting options had an implied credibility hierarchy, companies want all options to provide equal levels of confidence.
- ◆ Companies like the Inventory Management Plan (IMP) and feel it is key to the credibility of the inventory. However, not all companies can be expected to have a high-quality IMP in place in the year of joining program.



Feedback from June Meeting (cont.)

- ◆ Several companies have concerns with reporting facility level data to EPA because of confidentiality reasons. However, other companies think that the credibility of the inventory is enhanced if facility level data is provided.
- ◆ Companies want a way for EPA to track changes to the inventory from year to year without reporting detailed facility level data.

New Proposed Reporting Requirements



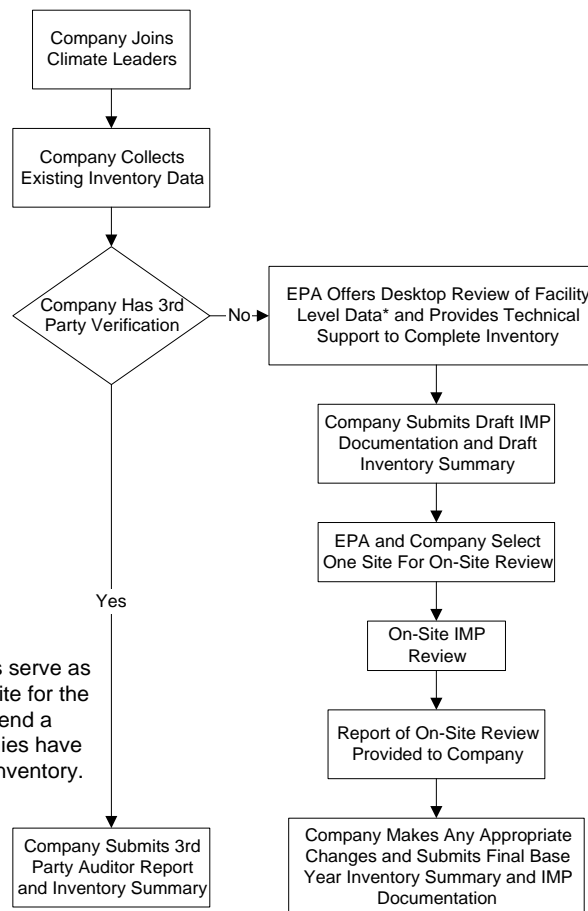
Base Year

Interim Years

Goal Year

Base Year Reporting

Year 1 - Base Year Data



* EPA's preference is to see facility level data, not only does this serve as a desktop review of the inventory but it also helps to choose a site for the site visit in Year 1. If confidentiality is a concern, EPA can send a contractor to review the data at a company site. Many companies have found this review to be helpful in improving the quality of their inventory.



Base Year Reporting Requirements

- ◆ Technical inventory support/gap analysis
 - ✦ helps identify boundaries and emissions sources
 - ✦ desktop facility-level data review encouraged
- ◆ IMP documentation and review
 - ✦ IMP documentation submitted - consistent w/ EPA checklist
- ◆ Corporate-level inventory data
 - ✦ corporate data submitted using inventory summary form
- ◆ Select site for on-site IMP review
 - ✦ assist partner in facility-level implementation of IMP
 - ✦ gives EPA confidence that IMP is being successfully implemented by Partner



Base Year Reporting - Technical Inventory Support/Gap Analysis

- ◆ Technical assistance for Partners to increase knowledge of Inventory Protocols.
 - ✦ helps identify boundaries, emissions sources, and emission factors
- ◆ Facility-level data desktop review encouraged
 - ✦ allows for a detailed desktop review of the inventory
 - ✦ if confidentiality is a concern, EPA can send a contractor to review the data at a company site
 - ✦ many companies have found this review to be helpful in improving the quality of their inventory, so EPA would like to continue to provide this assistance



Base Year Reporting - Inventory Management Plan Documentation

- ◆ EPA provides a checklist of components to include in an IMP
- ◆ The IMP checklist should be used as a guideline to prepare documentation
- ◆ Partners are not expected to have all components on the checklist in place the year they join
- ◆ If a company does not have an item on the checklist in place, they must document a plan to incorporate this item into their IMP over time



IMP Components

- ◆ 30 Components Total
 - ✦ broken into 7 main categories
 - ✦ 21 are required in first year
 - ✦ 7 can be implemented over time
 - ✦ 2 are optional



IMP Development

- ◆ An IMP can take different forms for different companies
- ◆ Good internal documentation will help to institutionalize the IMP
- ◆ A review of the IMP checklist will help to see if the IMP is complete
- ◆ The IMP checklist will help identify areas for improvement



Base Year Reporting - Summary Data

- ◆ Corporate-level inventory data:
 - can be completed at the same time that a Partner is developing their IMP documentation
 - annual report describes emissions in terms of total CO₂-equivalents at a corporate level, broken out by emission source type
 - the annual report also documents major changes made to Partners' inventory and normalizing factors used to track progress towards a reduction goal

Inventory Summary Form

Corporate Totals - Domestic	Base Year (original)	Base Year (adjusted)	Year 2	Year 3
Year				
EMISSIONS - Annual CO₂-Eq (metric tons)				
Direct Emissions				
Stationary Combustion				
Mobile Sources				
Refrigeration / AC Equip. Use				
Process / Fugitive (specify source):				
Total Direct Emissions				
Indirect Emissions				
Purchased Electricity				
Purchased Steam				
Purchased Hot Water				
Total Indirect Emissions				
Optional Indirect Emissions				
Optional (specify source):				
Total Optional Emissions				

Inventory Summary Form (cont.)

Corporate Totals - Domestic	Base Year (original)	Base Year (adjusted)	Year 2	Year 3
Year				
REDUCTIONS - Annual CO ₂ -Eq (metric tons)				
Offsets				
Offsets (specify source):				
Total Reductions From Offsets				
SUPPLEMENTAL INFORMATION - (metric tons/yr.)				
<i>Biomass CO₂ Emissions</i>				
Total Stationary Combustion - Biomass CO₂				
Total Mobile Sources - Biomass CO₂				
<i>Electricity Trading Transactions</i>				
Electricity Purchased for Resale (kWh)				
OPTIONAL SUPPLEMENTAL INFORMATION - (metric tons/yr.)				
<i>CFC and HCFC Emissions</i>				
Total - CFC				
Total - HCFC				
EMISSIONS INTENSITY INFORMATION				
<i>(only if reporting normalized emissions)</i>				
Total - Normalization Output (value)				
Specify Units:				



Base Year Reporting - On-Site IMP Review

- ◆ EPA will conduct one site visit to review facility-level implementation of the IMP
 - ✦ assist partner in facility-level implementation of IMP
 - ✦ give EPA confidence that IMP is being successfully implemented
- ◆ A report with a summary of findings and feedback will be provided to the Partner



Selection of Site for IMP Review

- ◆ Company and EPA work together to choose site
- ◆ Selection criteria to consider:
 - ✦ site representing largest emissions
 - ✦ site with the most types of emissions sources
 - ✦ site where the most technical assistance is needed



On-Site IMP Review

- ◆ Review some source data at selected facility for IMP checklist components
- ◆ Focus on key data, assumptions & methods
 - ✦ key data may include: fuel purchase records, electric bills, meter records, etc.
 - ✦ review supporting evidence and justification for assumptions
 - ✦ review quantification methods and data management systems
- ◆ Identify any suggested improvements and report feedback to the Partner



Base Year Inventory

- ◆ Modifications are made to the IMP and inventory based on feedback from EPA
- ◆ If modifications are made, Partner submits revised IMP documentation and inventory summary
- ◆ Base year inventory considered complete



Base Year Reporting Timeline

- ◆ Inventory support/gap analysis (1-2 months)
 - ✦ introductory conference call with inventory support contractor will be set up upon joining the program
 - ✦ completion time depends on complexity of inventory and amount of existing inventory data
- ◆ IMP documentation and review (3-6 months)
 - ✦ initial IMP documentation should be completed within 6 months
- ◆ Corporate level inventory data (3-6 months)
 - ✦ initial submission should be within 6 months
- ◆ On-site IMP review (6-12 months)

Interim Year Reporting

Year 2 Through Goal Year

Company Submits Auditor
Report and Current Year
Inventory Summary

Are There
Outstanding IMP
Components?

No →

Company Submits Any
Changes to IMP and Current
Year Inventory Summary

Yes
↓

Company Submits New IMP
Documentation and Draft Current
Year Inventory Summary

EPA Reviews Revised IMP
Documentation and Inventory
Summary and Provides Feedback

Company Makes Any Appropriate
Changes and Submits Final Current Year
Inventory Summary and IMP
Documentation



Interim Year Reporting

- ◆ Annual summary data
 - partners submit annual corporate-level data in the inventory summary form
 - included in the summary form is documentation for adjustments in the base year inventory
 - partners also submit modified IMP documentation for changes and/or additions made to their inventory management plan
- ◆ IMP feedback
 - as a partner's IMP continues to develop, EPA will provide feedback as needed

Goal Year Reporting

Goal Year

Company Submits Auditor
Report and Goal Year
Inventory Summary

Company Submits Goal Year
Inventory Summary Data and
Any Final Changes to IMP

EPA Performs Desktop Review of Facility
Level Data* and Confirms That All
Components of the IMP Have Been
Implemented



Goal Year Reporting

- ◆ Desktop review
 - ✦ EPA will conduct a desktop review of Partner's GHG inventory data and accounting methods and systems as detailed in the IMP documentation
 - ✦ EPA confirms that all recommended components of the IMP have been fully implemented and that the Partner has achieved the stated GHG target



3rd Party Verification Option

- ◆ As an alternative, Partners can submit an auditors report from a third party verification along with the corporate summary form
- ◆ Verification should include a review of all required IMP checklist components
 - previous verification reports will be compared to the new reporting requirements
 - in future verifications, the Partner should provide the IMP checklist to the verifier to assure that all required components are reviewed



Beyond Goal Year

- ◆ EPA will work with Partner to select new goal
- ◆ Goal year becomes new base year